



**Southern Tier East  
Regional Planning  
Development Board**

49 Court Street- Suite 222  
Binghamton, NY 13901-3274  
Phone: (607) 724-1327  
Fax: (607) 724-1194  
Email: [ste@steny.org](mailto:ste@steny.org)

[www.steny.org](http://www.steny.org)

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March 7, 2014

**Letter – Expression of Interest VIA ECFS**

Chairman Thomas Wheeler  
Commissioner Mignon Clyburn  
Commissioner Jessica Rosenworcel  
Commissioner Ajit Pai  
Commissioner Michael O’Rielly  
Chief of OSP Jonathan Chambers  
Federal Communications Commission  
445 12th Street, SW 20024  
Washington, DC

**Re: Expression of Interest – Rural Broadband Trials Connect America Fund, WC Docket No. 10-90**

Dear Chairman Wheeler, Commissioners, and Mr. Chambers:

Please accept this letter from Southern Tier East Regional Planning Development Board (STE) as participation in the Rural Broadband Trials announced at the January 30<sup>th</sup> FCC Open Meeting. We would like to take this opportunity to document our need for high-speed internet service throughout rural New York’s counties of Broome, Chenango, Cortland, Delaware, Otsego, Schoharie, Tioga and Tompkins, representing a population of 340,062 in the FCC eligible experiment area. We respectfully ask the Federal Communications Commission to consider our area’s need when making decisions regarding the Rural Broadband Trials and any future initiatives related to the Connect America Fund.

**Background**

STE is a regional planning organization representing a current total of 555, 887 residents in New York’s counties of Broome, Chenango, Cortland, Delaware, Otsego, Schoharie, Tioga and Tompkins as a local development district and economic development district. Our communities offer a “hometown” quality of life, the beauty of many natural resources, and several opportunities to pursue an advanced education. However, one of the challenges we face in our communities, is the demand for technology-driven infrastructure. At this point in time, we are caught in the “digital divide” and do not have the ability to provide basic internet services to our businesses and residents. As communities across the globe develop new internet applications and services, we can’t even access the world-wide-web.

Our local leaders are not only burdened with challenges of offering economic opportunities, but also by providing basic emergency services to their residents. In 2011, 6 Counties in the region were faced with impacts of Tropical Storm Lee and Hurricane Irene, and declared federal disaster areas. In Schoharie County, many residents had over two weeks without basic telephone and internet service. In Delaware County, the County had to erect temporary towers since all communications infrastructure was comprised.

Even when weather conditions are adequate, residents have experienced multiple telecommunications, particularly 911 emergency telecommunications. In 2013, the counties of Broome and Tioga, experienced 10 hours of system outages with their 911 systems because of a lack of redundant infrastructure capacity. The service providers for these counties are Verizon and Time Warner and these outages are an example of how large carriers have chosen to “walk away” from providing a reliable, redundant service for rural communities, and indeed, affect the communities’ well-



being.

Several of the region's employers (Lockheed Martin, Chobani Inc.) have faced difficulties and outages with an underserved broadband infrastructure. For instance, in Tioga County, Lockheed Martin lost telecommunications capability and over 800 employees were sent home for over 3 days. In Chenango County, the global headquarters of Chobani were unable to communicate with their largest manufacturing plant 8 miles away, causing a decrease in manufacturing productivity. In Delaware County, following Tropical Storm Lee, Amphenol Aerospace faced reduced telecommunication capacity at their Sidney plant and they are currently moving to a \$20 million facility to increase broadband capability. We cannot continue to have the region's largest employers impacted by the lack of basic broadband infrastructure.

Over the last 20 years, we have seen a 7% decline in our region's population and we must provide an opportunity for residents and businesses to stay and grow in the Southern Tier. In order to entice new businesses and retain current employers over the next 20 years, Strategic Plans document the need to maintain and expand our basic infrastructure, which emphasizes broadband.

Under the Appalachian Regional Commission (ARC), STE has served as the local development district for 8 counties in rural New York. ARC has encouraged STE's initiatives to develop and expand basic infrastructure, including water, sewer, rail and broadband. Since 2004, ARC has supported STE's efforts to map an inventory of telecommunications throughout the region and develop a business plan for broadband infrastructure expansion. In 2009, STE did establish a partnership with Southern Tier Central Regional Planning Development Board and ECC Technologies to construct an open-access middle-mile broadband ring throughout the region, however, funding was not successfully acquired to construct the infrastructure. Five years later, in 2014, the need for the vital infrastructure still exists and piece-meal approaches are floundering.

As part of the ARC, one of STE's goals for the community is to provide an environment for our residents and businesses to build and grow economies in upstate New York. If we can build a basic broadband infrastructure in the community, we will not only improve our residents' quality of life, but also have an opportunity to pursue economic development opportunities throughout our 8 counties. STE's boundaries also cross three of New York State's Regional Economic Development Councils, each of the Council's Strategic Plan includes a goal to expand affordable broadband infrastructure.

### **Geographic Territory**

Our region crosses 124 miles in upstate New York, our elevation ranges from rolling hills to the Catskill Mountains. A regional open-access middle-mile fiber ring would bring fiber to the community, and therefore provide a feasible opportunity for service providers to distribute their last-mile technology to the end user in our hilly terrain.

### **Proposed technology**

In order to prepare for the "next generation" of technologies, we would like to see broadband constructed in our community that supports 1 Gig of digital traffic. Right now, 4 Mbps download/1 Mbps upload is considered acceptable, but even that is not wide-spread throughout the region. STE's goal is to make an investment that supports growth for our community and economic viability.

We are looking for an affordable option such as fiber-to-the-home or fiber to a central hub, with wireless from that point to the end-user. We support an investment in broadband technology that allows our neighbors, business owners and students the same abilities to expand and evolve as other communities in the United States, and purchase this service at an equivalent rate.

STE is currently preparing a business plan, to utilize the organization's established nonprofit corporation and construct a middle-mile open-access fiber ring throughout the region. Building such infrastructure, would allow last-mile service providers to expand at a feasible cost and provide telephone, internet, data and television services in our unserved & underserved rural residential and commercial areas.

### **Existing Providers**

Several providers can be found in pockets of the region, those that do provide service are not in the eligible FCC census tracts, and where broadband service is provided, the cost exceeds the national monthly average by 64%.

### **Local or Tribal Government Participation**

As part of the ARC, one of STE's goals for the community is to provide an environment for our residents and businesses to build and grow in upstate New York.

STE has been working with ECC Technologies & Southern Tier Network, with a previously funded build-out of a middle-mile ring in Steuben, Schuyler, Chemung and southern Broome and Tioga Counties (non-eligible areas). STE is considering the feasibility of a similar business model venture with ECC Technologies, to bring fiber to the remaining unserved and underserved communities in the region. In this proposal, STE is also considering how to utilize the 2009 American Recovery and Reinvestment Act Broadband Technology Opportunities Program (ARRA BTOP) middle-mile broadband infrastructure, constructed and owned by Independent Optical Network (I-O-N), as to increase accessibility for service providers to expand their business in several of the experimental areas.

STE's boundaries cross three of New York State's Regional Economic Development Councils, each of the Council's Strategic Plan includes a goal to expand affordable broadband infrastructure.

### **List of Anchor Institutions**

Experimental census tracts in STE's region encompass 15 colleges and universities, 167 schools, 49 libraries, 8 hospital and 55 healthcare centers and also includes 230 local government properties.

Thank you for considering our Expression of Interest in your decisions about the amount of funding that will be allocated in the Rural Broadband Trials. We commend you in this effort to connect rural communities and are ready to help you close the digital divide.

Sincerely,

A handwritten signature in black ink, appearing to read 'Erik A. Miller', with a long horizontal line extending to the right.

Erik A Miller  
Director  
Southern Tier East Regional Planning Development Board